

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CENTRAL STATES, SOUTHEAST AND )  
SOUTHWEST AREAS PENSION FUND; )  
and CHARLES A. WHOBREY, as Trustee, )  
  ) Case No. 24-cv-1880  
*Plaintiffs,*                      )  
  ) Judge Mary M. Rowland  
v.                                     )  
  ) Magistrate Judge Keri L. Holleb  
CAROLYN POLK,                      ) Hotaling  
  )  
*Defendant.*                      )

**PLAINTIFFS' AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT**

Plaintiffs, Central States, Southeast and Southwest Areas Pension Fund and Charles A. Whobrey, one of its trustees, hereby move this Court for entry of a Consent Judgment. In support of this Motion, Plaintiffs state as follows:

1.       Plaintiffs filed this action on March 6, 2024, seeking to recover an overpayment of pension benefits from the Defendant Carolyn Polk (“Polk”) in the amount of \$36,386.27.
2.       Plaintiffs and Defendant have agreed to settle this matter and pursuant to the settlement terms, Defendant Polk has agreed to the entry of a Consent Judgment in favor of the Plaintiffs.
3.       Plaintiffs and Defendant have now agreed to the terms of a Consent Judgment.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter the Consent Judgment, attached hereto as Exhibit A.

Respectfully submitted,

*/s/Ama G. Gyimah*  
Ama G. Gyimah (ARDC #6329753)  
CENTRAL STATES FUNDS  
Law Department

8647 W. Higgins Road, 8th Floor  
Chicago, Illinois 60631  
(847) 232-5767  
[agyimah@centralstatesfunds.org](mailto:agyimah@centralstatesfunds.org)

January 9, 2025

*ATTORNEY FOR PLAINTIFFS*

**CERTIFICATE OF SERVICE**

I, Ama G. Gyimah one of the attorneys for the Central States, Southeast and Southwest Areas Pension Fund, certify that on January 9, 2025, I caused the foregoing *Plaintiffs' Agreed Motion for Entry of a Consent Judgment* to be filed electronically. This filing was served on all parties indicated on the electronic filing receipt via the Court's electronic filing system. A copy was also sent via e-mail and UPS overnight mail to:

Carolyn Polk  
9619 Arvin St.  
Houston, TX 77078-2801  
Polkcarolyn71@gmail.com

Respectfully submitted,

/s/Ama G. Gyimah  
Ama G. Gyimah (ARDC #6329753)  
CENTRAL STATES FUNDS  
Law Department  
8647 W. Higgins Road, 8th Floor  
Chicago, Illinois 60631  
(847) 232-5767  
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